

Andrew J. Miller (amiller@buddlerner.com)  
Alan H. Pollack (apollack@buddlerner.com)  
Dmitry Shelhoff (dshelhoff@buddlerner.com)  
Budd Larner, P.C.  
150 John F. Kennedy Parkway  
Short Hills, NJ 07078  
(973) 379-4800

*Attorneys for Defendants  
Dr. Reddy's Laboratories, Inc. and  
Dr. Reddy's Laboratories, Ltd.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

HORIZON PHARMA, INC. and POZEN  
INC.,

Plaintiffs,

v.

DR. REDDY'S LABORATORIES, INC.  
AND DR. REDDY'S LABORATORIES,  
LTD.,

Defendants.

Civil Action No. 3:11-02317 (MLC) (DEA)

Civil Action No. 3:13-00091 (MLC) (DEA)

*DOCUMENT ELECTRONICALLY FILED*

**MOTION DATE:** August 3, 2015

Oral Argument Requested

**NOTICE OF MOTION OF DEFENDANTS DR. REDDY'S LABORATORIES,  
LTD. AND DR. REDDY'S LABORATORIES, INC.  
FOR THEIR SECOND MOTION FOR  
SUMMARY JUDGMENT OF NON-INFRINGEMENT OF U.S. PATENT NO. 6,926,907**

**PLEASE TAKE NOTICE** that on August 3, 2015, or as soon thereafter as counsel may be heard, the undersigned attorneys for Dr. Reddy's Laboratories, Ltd., and Dr. Reddy's Laboratories, Inc., (collectively "DRL") will move before the Honorable Mary L. Cooper, United States District Judge, pursuant to Fed. R. Civ. P. 56 and Local Civil Rule 56.1, for an Order granting DRL summary judgment that none of the claims of United States Patent No.

6,926,907 has been or can be infringed by the importation, manufacture, use, sale and/or offer for sale of DRL's naproxen and esomeprazole magnesium delayed release tablet product as set forth in DRL's ANDA No. 204206 and that such importation, manufacture, use, sale and/or offer for sale of DRL's naproxen and esomeprazole magnesium delayed release tablet product as set forth in DRL's ANDA No. 204206 would not induce or contribute to the infringement of any of the claims of United States Patent No. 6,926,907.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, DRL will rely upon its Memorandum of Law, DRL's Local Rule 56.1 Statement of Material Facts, the declaration of Ellen T. Lowenthal with its exhibits, and DRL's reply papers, if any.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Rule 7.1(e) of the Local Rules of the District of New Jersey, a proposed form of order is being submitted concurrently with this motion.

DATED: July 9, 2015

Respectfully submitted,

/s/ Alan H. Pollack

Andrew J. Miller (amiller@buddlerner.com)  
Alan H. Pollack (apollack@buddlerner.com)  
Dmitry Shelhoff (dshelhoff@buddlerner.com)  
BUDD LARNER, P.C.  
150 John F. Kennedy Parkway  
Short Hills, New Jersey 07078  
Tel: (973) 379-4800

*Attorneys for Defendants and  
Counterclaim Plaintiffs  
Dr. Reddy's Laboratories, Ltd.  
and Dr. Reddy's Laboratories, Inc*